

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- X  
ANCHOR SALES & MARKETING, INC.,

*Plaintiff,*

- against -

RICHLOOM FABRICS GROUP, INC.,

*Defendant.*  
----- X

15-cv-4442 (RA)

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that upon the Memorandum of Law in support hereof dated September 18, 2015 (the "Memo of Law"), the Declaration of Gerard F. Diebner, dated September 17, 2015, the Exhibits annexed thereto, and all prior pleadings and proceedings had herein, Defendant Richloom Fabrics Group, Inc. will move this Court before the Honorable Ronnie Abrams, at the United States Courthouse for the Southern District of New York, 40 Foley Square, New York, New York 10007 in Courtroom 1506, at a date and time to be determined by the Court for an Order pursuant to Fed. R. Civ. P. 12 dismissing the Amended Complaint, or, in the alternative an Order pursuant to Fed R. Civ. P. 56 granting summary judgment in favor of Defendant,, on the grounds, and for the reasons, set forth in the Memo of Law.

Dated: New York, New York  
September 18, 2015

TANNENBAUM, HELPERN, SYRACUSE  
& HIRSCHTRITT LLP

By s/L. Donald Prutzman

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